



# TEXAS WATER DEVELOPMENT BOARD



James E. Herring, *Chairman*  
Lewis H. McMahan, *Member*  
Edward G. Vaughan, *Member*

J. Kevin Ward  
*Executive Administrator*

Jack Hunt, *Vice Chairman*  
Thomas Weir Labatt III, *Member*  
Joe M. Crutcher, *Member*

Received & Inspected

SEP - 7 2010

FCC Mail Room

August 30, 2010

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

Re: Office of Engineering and Technology Requests Information on Use of  
1675-1710 MHz Band, ET Docket No. 10-123

Dear Secretary Dortch:

I am writing in response to the Federal Communications Commission's request for information on the use of the 1675-1710 MHz Band. The bandwidth identified in this Docket (1675-1710) is currently used by federal agencies as well as many state agencies for remote collection of important environmental, hydrological, meteorological, and water quality data via the GOES and POES satellites. Stream gauge and groundwater-level data from long-established monitoring networks is transferred by these satellites in order to carry out vital water management functions from triggering pumping restrictions during drought to warning the public during floods. Loss of the ability to use this bandwidth to transmit data via the GOES and POES satellites would greatly impact state and federal efforts to manage our nation's natural resources.

Specifically, for the Texas Water Development Board and many of its stakeholders, access to data provided through the GOES system is critical. The GOES system provides timely access to the following types of real-time data:

1. Groundwater level monitoring data. Groundwater conservation districts are statutorily required to develop and implement plans to attain desired future conditions for their aquifers. They depend on this data to measure the effectiveness of actions.
2. Surface and groundwater water quality data. Water providers depend on this data to ensure the health and safety of their customers.
3. Stream and lake gauging data. State and federal agencies depend on this data to respond appropriately during various hydrologic conditions. This data is essential for accurate flood warning systems, drought monitoring, and long-range assessment of surface water availabilities.

Rec'd of Comm rec'd

## Our Mission

*To provide leadership, planning, financial assistance, information, and education for the conservation and responsible development of water for Texas.*

P.O. Box 13231 • 1700 N. Congress Avenue • Austin, Texas 78711-3231  
Telephone (512) 463-7847 • Fax (512) 475-2053 • 1-800-RELAYTX (for the hearing impaired)  
[www.twdb.state.tx.us](http://www.twdb.state.tx.us) • [info@twdb.state.tx.us](mailto:info@twdb.state.tx.us)

TNRIS - Texas Natural Resources Information System • [www.tnris.state.tx.us](http://www.tnris.state.tx.us)  
*A Member of the Texas Geographic Information Council (TGIC)*

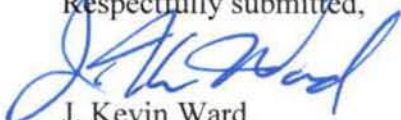


Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
August 30, 2010  
Page 2

Proper management, including thoughtful conservation and innovative water development, is the only way to meet our current water needs and provide for the fruitful economic development of our state. Such management depends on the availability of accurate, reliable, and consistent data. Many entities in our state, ranging from single county groundwater conservation districts to small and large municipalities to the state natural resources agencies, have invested heavily in practices and programs that depend on the GOES downlink frequency to acquire data from nearly 300 monitoring sites across Texas. The number of sites collecting and transmitting groundwater level data via the GOES downlink frequency is expected to increase by up to 20 percent yearly in the next five years.

I urge you to ensure that the 1675-1710 MHz frequencies remain available for use for critical data transmission services. The Texas Water Development Board and its stakeholders are invested in the long-term availability of the data transmitted on this bandwidth. The responsible use of this important information will lead to economic development, generating needed tax revenue and, more importantly, help to ensure the health and safety of the people of the State of Texas and the nation.

Respectfully submitted,



J. Kevin Ward  
Executive Administrator

c: Robert E. Mace, Deputy Executive Administrator, TWDB